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13 **UNITED STATES BANKRUPTCY COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

15 **In re:** Case No. 19-30088 (DM)

16 **PG&E CORPORATION**

Chapter 11

17 **-and-**

(Lead Case)

18 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

(Jointly Administered)

19 **Debtors**

21  Affects PG&E Corporation  
22  Affects Pacific Gas and Electric Company  
23  Affects both Debtors

25 \*All papers shall be filed in the Lead Case,  
26 No. 19-30088 (DM)

21 **DECLARATION OF KODY KLEBER IN  
SUPPORT OF REPLY IN SUPPORT OF  
MOTION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
TO COMPEL PRODUCTION OF  
THIRD-PARTY CONTRACTOR  
DOCUMENTS**

25 Date: August 27, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

1 KODY D. L. KLEBER, under penalty of perjury, declares:

2       1. I am a partner at Baker & Hostetler LLP, counsel to the Official Committee of Tort  
3 Claimants (the “**TCC**”) of PG&E Corporation and Pacific Gas and Electric Company (the  
4 “**Debtors**”) in these chapter 11 cases.

5       2. I submit this Declaration in support of the Reply in Support of Motion of the Official  
6 Committee of Tort Claimants to Compel Production of Third Party Contractor Documents  
7 (“**Motion**”).

8       3. Unless otherwise stated in this Declaration, I have personal knowledge of the facts  
9 set forth herein.

10      4. Attached hereto as **EXHIBIT A** is a true and correct copy of document bates-labeled  
11 PGE-BK-0000024456, Contract Work Authorization No. C8068 dated March 13, 2018, between  
12 Pacific Gas and Electric Company and Quanta Technology, LLC.

13      5. Attached hereto as **EXHIBIT B** is a true and correct copy of the is a true and correct  
14 copy of document bates-labeled PGE-BK-0000028237, Contract Work Authorization No.  
15 4400004292 dated January 8, 2014, between Pacific Gas and Electric Company and Burns &  
16 McDonnell Engineering Company, Inc.

17  
18 *Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States  
19 of America that the foregoing is true and correct to the best of my knowledge and belief.*

20  
21 Executed on August 26, 2019

/s/ Kody D.L. Kleber

22 By: Kody D. L. Kleber  
Admitted Pro Hac Vice